

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 12, 1997

Mr. George Crow
Vice President of Operations
Quaker State Corporation
225 East John Carpenter Freeway
Irvine, TX 75062

CPF No. 37509

Dear Mr. Crow:

On May 20-22, 1996, a representative of the Central Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your pipeline facilities and records in Magnolia, Ohio.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195 and Part 199. The items inspected and the probable violations are:

1. § 195.402 Procedural Manual for Operations, Maintenance, and Emergencies.

Each operator shall prepare and follow for each pipeline system, a manual of written procedures (O&M) for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.

A review of the Company's records found that the Company was operating in accordance with part 195 and keeping adequate records. However, a review of Quaker State's O&M procedural manual found that the manual lacked written procedures for a majority of the maintenance functions the Company was conducting. The O&M Manual should be revised to include the following procedures:

- a) Welding, general, as specified in § 195.214 and as related to § 195.422.
- b) Qualification of welders, as specified in § 195.222

- and as related to § 195.422.
- c) Verification of the removal of arc burns, as specified in § 195.226 and as related to § 195.422.
 - d) Welds and welding inspection, as specified in § 195.228 and as related to § 195.422.
 - e) Welds, repair or removal of defects, as specified in § 195.230 and as related to § 195.422.
 - f) Nondestructive testing of welds, as specified in § 195.234 and as related to § 195.422.
 - g) Retention of construction records, as specified in § 195.266 and as related to § 195.422.
 - h) Review of the O&M manual, at intervals not to exceed 15 months, but at least once each calendar year, as specified in § 195.402(a)
 - i) Making records, maps, and history available, as specified in § 195.402(c)(1).
 - j) Gathering data for the purpose of reporting incidents, as specified in § 195.402(c)(2), which includes:
 - i) Whenever an operator receives any changes in the information reported or additions to the original report on DOT Form 7000-1, it shall file a supplemental report within 30 days, as specified in § 195.54
 - k) Operation, maintenance, and repair of the pipeline system in accordance with Subpart F, as specified in § 195.402(c)(3), which includes the following:
 - i) Training, as required by § 195.403.
 - ii) Maintenance of maps and records, as required by § 195.404.
 - iii) Establishment of the maximum operating pressure, as required by § 195.406.
 - iv) Procedures for the communication system to provide for the transmission of information needed for the safe operation of its pipeline, as required by § 195.408.

- v) Procedures for the design and placement of line markers, as required by § 195.410.
- vi) Procedures for the inspection of the rights-of-way, as required by § 195.412.
- vii) Procedures for the administration and maintenance of cathodic protection and the prevention of atmospheric corrosion, as required by § 195.414.
- viii) Procedures for the prevention of internal corrosion, as required by § 195.418.
- ix) Procedures for valve maintenance, as required by § 195.420.
- x) Procedures for pipeline repairs, as required by § 195.422.
- xi) Procedures for the movement of pipelines, as required by § 195.424.
- xii) Procedures for scraper and sphere facilities, as required by § 195.426.
- xiii) Procedures for firefighting equipment, as required by § 195.430.
- xiv) Procedures for the security of the facilities, as required by § 195.436.
- xv) Procedures for establishing and maintaining a public educational program, as required by § 195.440.
- xvi) Procedures for establishing and maintaining a damage prevention program, as required by § 195.442.
- l) Analyzing pipeline accidents and determining causes, as specified in § 195.402(c)(5).
- m) Minimizing the potential for hazards, as specified in § 195.402(c)(6).
- n) Abandoning of pipeline facilities, as specified in § 195.402(c)(10).

- o) Minimizing the likelihood of accidental ignition, as specified in § 195.402(c)(11).
- p) Establishment and maintenance of the liaison with the fire, police, and other public officials, as specified in § 195.402(c)(12).
- q) Periodic review of the work to determine if the procedures are adequate, as specified in § 195.402(c)(13).
- r) Taking adequate precautions in excavated trenches, as specified in § 195.402(c)(14).
- s) Responding to, investigating, and correcting the cause of unintended shutdowns, increase/decrease in pressure or flow rate outside the normal operating limits, loss of communication, operation of safety devices, malfunction of other components, deviation of normal operations, and personnel error, as specified in § 195.402(d)(1)(I-v).
- t) Checking the variations from normal operations after the abnormal condition has ended, as specified in § 195.402(d)(2).
- u) Correcting variations in operation of equipment and controls, as specified in § 195.402(d)(3).
- v) Periodic review of the response of the operator personnel to determine the effectiveness of the procedures to control an abnormal operation, as specified in § 195.402(d)(5).
- w) Prompt and effective response to a notice of each type of emergency, fire, explosion, accidental release of hazardous liquids, operational failure, and natural disaster, as specified in § 195.402(e)(2).
- x) Controlling the release of liquid at the failure site to minimize the hazards, including possible ignition, as specified in § 195.402(e)(5).
- y) Minimizing the public exposure and accidental ignition by assisting with evacuation of residents, halting traffic on roads and railroads in the affected areas, as specified in § 195.402(e)(6).

- z) Providing for a post accident review of employee activities to determine whether the procedures were effective in each emergency, as specified in § 195.402(e)(9).
- aa) Safety-related condition reports, as specified in § 195.56 and § 195.402(f).

2. § 199.7 - Anti-Drug Plan

§ 199.7(a)(4) requires each operator to maintain and follow a written anti-drug plan that conforms to the requirements of this part and DOT procedures.

A review of the Company's anti-drug plan revealed several procedures that were missing from the plan. The anti-drug plan should be revised to include the following:

- a) The commencement date of the anti-drug plan, as indicated in § 199.1.
- b) The procedure of contractor monitoring, as required by § 199.21.
- c) The procedures for recordkeeping, as required by § 199.23.
- d) The procedures for preparation for testing, as required by § 199.5 and § 40.23.
- e) The procedures for specimen collection and security, as required § 199.5 and § 40.25(b).
- f) The procedures for employer blind sampling, as required by § 199.5 and § 40.31(d).

3. § 199.202 - Alcohol Misuse Plan

§ 199.202 requires each operator to maintain and follow a written alcohol misuse plan that conforms to the requirements of this subpart and the DOT procedures in Part 40 of this title. The plan shall contain methods and procedures for compliance with all the requirements of this subpart, reporting, education, and training.

A review of the Company's alcohol misuse plan revealed that there were several items that were missing from the plan. The plan should be revised to include the following:

- a) Procedures for the retention of the records, as specified in § 199.227.
- b) Procedures for the reporting of alcohol test results, as specified in § 199.229.
- c) Procedures for contractor monitoring, as required by § 199.245.

When it is found that an operator's procedures are inadequate, 49 C.F.R. §190.237 provides that the operator, after notice and opportunity for hearing may be required to amend its plans and procedures. This letter serves to provide you with the notice of the inadequate procedures and the response options as prescribed under §190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, please provide the revised procedures within sixty (60) days of receipt of this notice.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety